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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF  
 GOVERNMENT EMPLOYEES, *et al.*,

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL  
 MANAGEMENT, *et al.*,

Defendants.

) Case No. 3:25-cv-1780-WHA

) **DECLARATION OF YURI S. FUCHS**

FUCHS DECL.

1 I, YURI S. FUCHS, declare as follows:

2 1. I am a Trial Attorney in the United States Department of Justice and the attorney of  
3 record for Defendants in this action. I submit this declaration in support of the parties' Stipulation and  
4 [Proposed] Order to Amend Scheduling Order filed concurrently herewith. The facts set forth in this  
5 declaration are within my personal knowledge or based upon documents and information I have received  
6 in the course of this litigation.

7 2. Counsel for Defendants expect to be unavailable due to personal travel and annual leave  
8 during the period of June 3-19, 2025.

9 3. This is the parties' first joint request to modify the summary judgment deadlines in this  
10 matter. The parties also previously stipulated to continue the government's deadline to respond to the  
11 Complaint. *See* Dkt. No. 203.

12 4. The requested modification will directly affect the summary judgment schedule, which is  
13 the only current remaining event in this matter apart from Defendants' obligations under this Court's  
14 April 18, 2025 preliminary injunction. *See* Dkt. No. 202.

15 I declare under penalty of perjury under the laws of the United States that the above is true and  
16 accurate to the best of my information, knowledge, and belief. Executed this 1st day of May, 2025, in  
17 Washington, DC.

18 /s/ Yuri S. Fuchs  
19 YURI S. FUCHS  
20 Trial Attorney  
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